

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK-----X
MOSES STRAUSS, et al.,

Plaintiffs,

-against-

CREDIT LYONNAIS, S.A.,

Defendant
-----X

Case No. 06-cv-702 (CPS)(MDG)

-----X
BERNICE WOLF , et al.,

Plaintiffs,

-against-

CRÉDIT LYONNAIS, S.A.,

Defendant.
-----X

Case No. 07-cv-914 (CPS) (MDG)

[PROPOSED] SCHEDULING ORDER

Whereas, pursuant to Fed. R. Civ. P. 16 and 26(f), the plaintiffs in the above-captioned Actions and defendant Credit Lyonnais (“Defendant”) have met and agreed upon the following schedule for those cases (collectively, the “Actions”);

IT IS HEREBY ORDERED that the following schedule shall govern the Actions:

<u>Date</u>	<u>Deadline</u>
February 17, 2009	Deadline for the parties to propound written discovery requests or Letters of Request under the Hague Convention and similar procedures related to non-damages and non-expert issues other than requests for admissions related to authenticity and admissibility of documents.
March 30, 2009	Deadline for the parties to file final motions to compel relating to pending non-expert and non-damages discovery disputes.

<u>Date</u>	<u>Deadline</u>
May 8, 2009	Deadline for completion of all fact discovery not related to Plaintiffs' damages. This includes non-expert depositions, subject to production of records or identification of fact witnesses resulting from court-ordered production of records resulting from motions to compel filed prior to March 30, 2009. This does not include responses, and related production, to Letters of Request under the Hague Convention and similar procedures served on non-parties prior to February 17, 2009.
May 15, 2009	Deadline for all Plaintiffs to submit completed Plaintiff Profile Forms.
June 15, 2009	Deadline for parties to provide expert reports, other than those related to Plaintiffs' damages, pursuant to Fed. R. Civ. P. 26(a)(2)(B). Such reports will provide all information required by Rule 26.
August 14, 2009	Deadline for parties to provide expert reports of witnesses, other than those related to Plaintiffs' damages, they intend to call to testify at trial solely to contradict or rebut evidence on the same subject matter identified by another party under Fed. R. Civ. P. 26(a)(2)(B).
August 28, 2009	Deadline for the parties to serve contention interrogatories.
September 15, 2009	Deadline for serving requests for admissions related to authenticity and admissibility of documents.
October 14, 2009	Deadline for the completion of expert depositions other than those related to Plaintiffs' damages.
October 16, 2009	Deadline for the parties to respond fully to pending contention interrogatories.
October 23, 2009	Deadline for the completion of all discovery.
December 1, 2009	Deadline to file <i>Daubert</i> and dispositive motions.
January 19, 2010	Deadline to file oppositions to <i>Daubert</i> and dispositive motions.
February 19, 2010	Deadline to file reply briefs in support of <i>Daubert</i> and summary judgment motions.
April 22, 2010	Pretrial Conference on liability issues only.
	Parties to agree on a schedule for damages discovery, to begin no sooner than 20 days after a verdict for plaintiffs on liability, with a damages trial to begin within 180 and 365 days after the conclusion of the liability trial.

Dated: December __, 2008

Hon. Marilyn D. Go